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10 STONEBRIDGE LIFE INSURANCE COMPANY

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION

14  
15 JESSICA LEE, individually and on behalf of a  
class of similarly situated individuals,

16 Plaintiff,

17 v.

18 STONEBRIDGE LIFE INSURANCE  
19 COMPANY, a Vermont corporation, and  
TRIFECTA MARKETING GROUP LLC, a  
20 Florida limited liability company,

21 Defendants.

Case No. CV 11-0043-RS

**STIPULATION AND  
~~[PROPOSED]~~ ORDER TO  
FURTHER STAY DEADLINES**

Judge: Hon. Richard Seeborg

Action Filed: Jan. 4, 2011

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1 Plaintiff Jessica Lee, Defendant Stonebridge Life Insurance Company (“Stonebridge”),  
2 and Defendant Trifecta Marketing Group, LLC (“Trifecta”) (collectively the “Parties”), by and  
3 through their respective counsel of record, hereby enter into the following stipulation:

4 WHEREAS, the Parties have reached a class action settlement in principle that would  
5 resolve all of the claims of Plaintiff and the Class against both Stonebridge and Trifecta;

6 WHEREAS, the Court has approved stipulations between the Parties that stayed all  
7 activity in this Action, including all hearings and discovery and motion deadlines, for a total  
8 period of approximately 11 weeks to allow the Parties to work on a class action settlement  
9 agreement and submit it to the Court for preliminary approval (Docket No. 149);

10 WHEREAS, the Parties agreed to submit a joint status report to the Court upon the  
11 expiration of current stay to inform the Court of the status of the settlement;

12 WHEREAS, the Parties have been diligently preparing and exchanging drafts of the class  
13 action settlement agreement and related documents, but seek a brief 9-day extension of the  
14 current stay, through February 13, 2014, to work on finalizing the agreement;

15 WHEREAS, the Parties believe a further stay of all case deadlines is warranted to avoid  
16 unnecessary litigation expenses and to conserve the resources of both the Parties and the Court;

17 THEREFORE, subject to the approval of the Court, the Parties agree and stipulate that  
18 this Action, including all hearings and discovery and motion deadlines, shall remain stayed  
19 through February 13, 2014. The Parties agree to submit a joint status report on the day that this  
20 stay is scheduled to expire to inform the Court of the status of the settlement, unless Plaintiff has  
21 moved for preliminary approval of the class action settlement agreement on or before such time.

## **IT IS SO STIPULATED.**

Dated: February 4, 2014

MORRISON & FOERSTER LLP

By: /s/ Tiffany Cheung  
TIFFANY CHEUNG

Attorneys for Defendant  
STONEBRIDGE LIFE INSURANCE  
COMPANY

Dated: February 4, 2014

EDELSON P.C.

By: /s/ Ryan D. Andrews  
**RYAN D. ANDREWS**

Attorneys for Plaintiff  
JESSICA LEE and the class

Dated: February 4, 2014

# LAW OFFICES OF ALEXANDER SKLAVOS

By: /s/ Alexander E. Sklavos  
ALEXANDER E. SKLAVOS

Attorney for Defendant  
TRIFECTA MARKETING GROUP,  
LLC

**PURSUANT TO STIPULATION, IT IS SO ORDERED**

Dated: 2/5/14

*Rick Sebak*

Hon. Richard Seeborg  
United States District Judge